

# **POLICY BULLETIN**

## **CHILD NUTRITION PROGRAMS**

**NSLP 23-06**

**August 14, 2006**

**SUBJECT: Monitoring SFA Implementation of HACCP-Based Food Safety Program**

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This memorandum provides interim guidance on monitoring School Food Authority (SFA) implementation of the food safety program required by the Child Nutrition and WIC Reauthorization Act of 2004. The law required implementation of the school food safety program in the SY 2005-2006. FNS anticipates that by now most SFAs have implemented or are close to completing implementation of the program at each food preparation and service facility under their jurisdiction. The guidance material intended to help develop the food safety program was distributed in June 2005 ("Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles").

The School Meals Initiative review forms have been revised and the Coordinated Review Effort (CRE) instruction manual is being revised to incorporate food safety in the general review area. Until revised CRE instructions are issued our office will take the following steps to confirm implementation of the food safety program:

- 1) Review the of the written food safety program to ensure that it follows the FNS guidance cited above. (Although USDA recommends that SFAs follow the Process Approach to HACCP, they may use the traditional approach to HACCP if the resulting food safety program is consistent with the June 2005 guidance.) The food safety program must address Standard Operating Procedures and the HACCP principles described in the guidance.
- 2) Examine food safety records from the review site to determine if the written program is operational. Documents to review may include food preparation process charts, temperature logs, and descriptions of standard operating procedures.
- 3) Review HACCP training plans and records to assess their adequacy and to verify employee participation.